WTCI-611-P

THE PORT AUTHORITY OF [illegible] Memorandum

0038339

To: Fred Di Paolo, Manager, World Trade Center Planning Division
From: John L. Hofmann
Date: August 19, 1982
Subject: ONE WORLD TRADE CENTER - ZONE 1 - AIR SAMPLING DURING TENANT ALTERATION WORK
Reference: Memo, J. Carlock to H. Pool, Jr., dated 3/2/82, same subject
Copy to: J. Agura, W. Connell, D. Censullo, L. Feld, R. Linn, D. Montalbano, J. Navas, C. Vasquez

Refer To | Date | Noted By | Date

PORT AUTHORITY OF N. Y. & N. J.
RECEIVED
SEP 1982
WORLD TRADE DEPARTMENT
DEP. DIR. PHYS. FAC.

Sent Copy to Censullo, Loz.

In accordance with the reference and our telephone conversation we obtained air samples in rooms 1201 and 1527 of One World Trade Center, unoccupied tenant areas. Base line air samples were taken prior to any work activity. Subsequent samples were obtained in Room 1201 during the installation of walls, ceilings, plumbing and electrical fixtures. In Room 1527, the air was sampled while the pressure test for the sprinkler system was in progress that is, after the installation of the sprinkler system but prior to reinstallation of the hung ceiling.

Although the samples from Room 1201 indicated no marked change in fiber count, we noted that samples taken in Room 1527 during the pressure test show an increase in fibers of approximately ten times the base line fiber count. This increase indicates the need to implement and maintain control of air pollutants during sprinkler installations in Zone 1, One World Trade Center.

Because we were not notified concerning the start of work in both locations, we were unable to obtain air samples during the actual work periods of removing the ceiling and installing the sprinkler pipe. It is anticipated that air samples during these periods will be taken when the next contract in the first zone is in progress. Kindly advise us when the next contract is scheduled to start in an unoccupied area.

In view of test results and the presence of asbestos in Zone 1, One World Trade Center, we continue to recommend that alteration work which involves or exposes the plenum be carried out at night in tenant occupied areas and that clean up procedures be conducted to protect the remainder of the building from contamination and to remove pollutants in the space prior to occupancy by tenant personnel each day.

When alteration contracts require removal of more than one ceiling panel at intermittent locations and the subsequent disturbance of spray-on fire protection material during construction, the contract should require that:

1. The work be carried out in compliance with OSHA regulation 1910.1001 and the EPA regulations for asbestos, CFR title 40, part 40, subparts A and B and appendix.

Info - Testing not to be done by Rick Mc7.

PA 99A
3-80

PLAINTIFF'S EXHIBIT
PX-658

2. After each work shift, the work area shall be vacuum cleaned with a "Nilfisk" high efficiency particulate vacuum cleaner. The cleaning shall include all permanent surfaces. When dust proof barriers are removed they shall be disposed of as required by OSHA code. Dust proof barriers shall not be reused.

3. If tenant employees are to occupy the work area after each work shift then:

   a. A period of dust settlement, a minimum of two hours, shall be scheduled in which there is no air disturbance in the area.

   b. At the completion of the two hour settlement period, the cleanup and vacuuming procedure of item #2 shall be carried out.

4. Contaminated work clothes, barrier material and vacuum bags shall be disposed of in an approved manner. A "Certificate of Approved Disposal" shall be obtained by the contractor and submitted to the engineer.

It should be noted that the above requirements are more extensive than those set forth in Schedule E previously developed by the World Trade Center Planning Division. Our review of schedule E indicated that it should be applied only when work requires the removal of a single isolated ceiling panel for inspection purposes or when maintenance is to be performed that does not require disturbance of the spray-on fireproofing. For other above ceiling work when spray-on fireproofing is disturbed, it is required to comply with EPA and OSHA regulations.

If you have any questions concerning our recommendations or code requirements we will be happy to discuss them with you.

John L. Hofmann
Senior Environmental Protection Specialist
Risk Management Division

JLH/scj